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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: AUG 21 2019

August 12, 2019

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write to seek a modification of Mustafa Abdel-Wadood's bail conditions. The government (AUSA Andrew Thomas) consents to this proposed modification.

When Mr. Abdel-Wadood's family arrived in New York City for the summer, his wife and son surrendered their passports with the intention that Pre-Trial Services would maintain possession of them until the family needed to return to Dubai for the beginning of the school year. Mr. Abdel-Wadood's wife and son are now scheduled to return to Dubai the evening of August 24, 2019. Additionally, Mr. Abdel-Wadood's son is scheduled to take the SAT college admissions exam on that same date; he will need to show his passport for identification. Accordingly, we respectfully request that Mr. Abdel-Wadood's family's passports be returned on August 22, 2019 to enable his son to take the SAT exam and to facilitate Mr. Abdel-Wadood's family's return travel to Dubai.

Mr. Abdel-Wadood is currently permitted to travel in Manhattan between 7 a.m. and midnight. There are also four co-signors on a \$10 million bond secured by two properties. Mr. Abdel-Wadood would continue to be electronically monitored and his bond conditions would remain in place.

Paul Shechtman
Partner

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As noted, the government consents to this proposed modification; Pretrial Services has no objection and reports that Mr. Abdel-Wadood has been fully compliant with his bail conditions.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

cc: AUSA Andrew Thomas
Pretrial Services Officer Joshua Rothman

MEMO ENDORSED

Granted

SO ORDERED

he
LEWIS A. KAPLAN, USA
8/17/19



U.S. Department of Justice

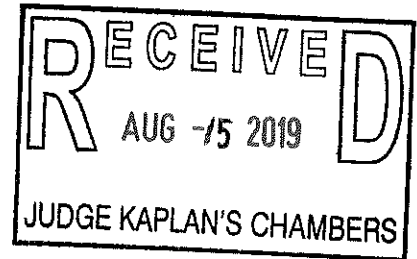
*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 15, 2019

BY EMAIL

The Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: *United States v. Mustafa Abdel Wadood*, 19 Cr. 233 (LAK)

Dear Judge Kaplan:

The Government respectfully writes to inform the Court that it has no objection to the proposed bail modification set forth in the letter from Mustafa Abdel-Wadood's counsel dated August 12, 2019 in the above-captioned case.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: _____/s/_____
Andrea Griswold
Andrew Thomas
Max Nicholas
Assistant United States Attorneys
(212) 637-1205/2106/1565

cc: Paul Shechtman, Esq. (via email)
Pre-Trial Services Officer Joshua Rothman (via email)